

ANDREW J. KRAMER, ESQ.  
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ATTORNEY FOR DEFENDANTS

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LEONARD K. HILL	:	CIVIL ACTION
	:	NO.
vs.	:	
	:	
STADIUM CASINO RE, LLC, d/b/a LIVE!	:	
CASINO AND HOTEL PHILADELPHIA	:	
	:	
and	:	
	:	
STEPHEN MOLLOY	:	

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**NOTICE OF REMOVAL**

**TO:** Susan B. Ayres, Esquire  
**HILL & ASSOCIATES P.C.**  
1700 Market Street, Suite 3150  
Philadelphia, PA 19103

**PLEASE TAKE NOTICE** that Defendant, Stadium Casino RE, LLC d/b/a Live! Casino and Hotel Philadelphia, has filed a Petition in the Eastern District of Pennsylvania for the removal of an action now pending in the Court of Common Pleas of Philadelphia County, entitled, Leonard K. Hill v. Stadium Casino Philadelphia, LLC, et al.; No. 240500943;

**FURTHER TAKE NOTICE** that Defendant, Stadium Casino RE, LLC d/b/a Live! Casino and Hotel Philadelphia, have at the same time filed with the United States District Court for the Eastern District of Pennsylvania, a copy of the Complaint, which was filed and entered in the Court of Common Pleas of Philadelphia County.

A copy of said Notice of Removal is attached to this Notice and is hereby served upon you.

**KANE, PUGH, KNOELL, TROY & KRAMER LLP**

DATE: September 23, 2024

BY:  \_\_\_\_\_  
ANDREW J. KRAMER, ESQUIRE

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	:	
and	:	
	:	
STEPHEN MOLLOY	:	

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**NOTICE OF REMOVAL OF DEFENDANT STADIUM CASINO RE, LLC D/B/A  
LIVE! CASINO AND HOTEL PHILADELPHIA**

Defendant, Stadium Casino RE, LLC d/b/a Live! Casino and Hotel Philadelphia, by and through its undersigned attorney, gives notice of the removal of the above captioned action to this Court of a State of Civil Action pending in the Court of Common Pleas of Philadelphia County, Pennsylvania, and in support thereof avers as follows:

1. A civil action has been brought against Defendant by the Plaintiff in the Court of Common Pleas of Philadelphia County, Case No. 240500943. *See* copy of Complaint attached hereto as **Exhibit “A.”**

2. This is an action over which the Court has original jurisdiction pursuant to 28 U.S.C. § 1332, because it is a civil action between citizens of different states and exceeds the required amount in controversy, exclusive of interest and costs pursuant to 28 U.S.C. § 1332.

3. The State Court where the action was originally filed is located in Philadelphia County, Pennsylvania, which is embraced within this judicial district.

4. The Plaintiff is, and at the time of the filing of this action, a citizen of the Commonwealth of Pennsylvania.

5. At all times relevant hereto, Defendant Stadium Casino RE, LLC had a principal place of business located at 601 E. Pratt Street, 6<sup>th</sup> Floor, Baltimore, MD 21202. *See* copy of Affidavit of Keith Hudolin attached hereto as **Exhibit “B.”**

6. At all times relevant hereto, Defendant Stadium Casino RE, LLC was a foreign limited liability company registered in Delaware with a principal place of business located at 601 E. Pratt Street, 6<sup>th</sup> Floor, Baltimore, MD 21202. *See* **Exhibit “B.”**

7. At all times relevant hereto, Defendant Stadium Casino RE, LLC was owned by Stadium Casino Baltimore Investors, LLC which is a limited liability company registered in Delaware. *See* **Exhibit “B.”**

8. At all times relevant hereto, Defendant Stadium Casino Pennsylvania, LLC was a wholly owned subsidiary of Stadium Casino RE, LLC.

9. At all times relevant hereto, all of the members of Stadium Casino Baltimore Investors, LLC are domiciled in Maryland and Texas. *See* **Exhibit “B.”**

10. For purposes of diversity the citizenship of a limited liability company is determined by the domicile of its members.

11. Upon information and belief, in-state Defendant Stephen Molloy has not been served with a copy of the Complaint as of the time of filing of this Notice of Removal.

12. The action commenced by Plaintiff is a civil action where the amount in controversy exceeds \$75,000, exclusive of interest and costs, and is between citizens of different states.

13. Upon information and belief, Defendant is filing said notice in compliance with the requirements under 28 U.S.C. § 1446(b).

14. By reason of the foregoing, a removal of the action to this Court is proper, under 28 U.S.C. §§ 1332(a), 1441(a).

15. The statutory requirements having been met; the state action is properly removed to United States District Court for the Eastern District of Pennsylvania.

**KANE, PUGH, KNOELL, TROY & KRAMER, LLP**

Dated: September 23, 2024

BY: 

\_\_\_\_\_  
ANDREW J. KRAMER, ESQUIRE  
Attorney for Defendants

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and	:	
	:	
STEPHEN MOLLOY	:	

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**CERTIFICATE OF SERVICE**


I, Andrew J. Kramer, certify that on this date I served a true and correct copy of the Notice of Removal of Defendants Stadium Casino RE, LLC d/b/a Live! Casino and Hotel Philadelphia on all counsel of record and unrepresented parties via U.S. First Class Mail, postage prepaid, as follows:

Susan B. Ayres, Esquire  
**HILL & ASSOCIATES P.C.**  
1700 Market Street, Suite 3150  
Philadelphia, PA 19103

DATE: September 23, 2024

**KANE, PUGH, KNOELL, TROY & KRAMER, LLP**

BY: \_\_\_\_\_

  
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STEPHEN MOLLOY	:	

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**DEFENDANT'S CERTIFICATE OF FILING OF  
COPY OF NOTICE OF REMOVAL WITH THE STATE COURT**

I, Andrew J. Kramer, Esq., counsel for defendant, hereby certify that on this date a certified copy of Defendant's Notice of Removal will be filed with the Prothonotary of the Court of Common Pleas of Philadelphia County, Pennsylvania, wherein is pending the State Court action which is the subject of the removal.

**KANE, PUGH, KNOELL, TROY & KRAMER, LLP**

DATE: September 23, 2024

BY: \_\_\_\_\_

  
ANDREW J. KRAMER, ESQ.  
Attorney for Defendant